

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-cv-24228-CMA

MEGAN PETE,

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,

Defendant,

_____/

DEFENDANT'S SECOND AMENDED MOTION FOR CONTINUANCE

Comes now, the Defendant, MILAGRO COOPER, by and through undersigned counsel, and files this Motion to Continue the pretrial conference currently scheduled for October 30, 2025, and in support thereof states the following:

1. This case is currently scheduled for a pretrial conference on October 30, 2025.
2. Undersigned counsel is currently in a Capital Homicide trial in Hillsborough County, Florida, State of Florida v. Alicia Andrews 24-CF-11996-B, which should last through October 31, 2025.
3. Undersigned counsel is asking for this case to move to a date at which he can be present for the hearing.
4. Undersigned counsel is available the week of November 3rd.

5. In addition, Ronda Dixon has a sentencing hearing in a high-profile double homicide case on October 29th, which she sought to continue, and the continuance was denied, citing the fact that this case is civil and the case in Los Angeles, People v. Pearce BA498423, is a double homicide case with multiple alleged victims. Sentencing was scheduled for the 29th, before the court made its Sua Sponte order, and the estimated time is several hours due to multiple victims. I worked hard on this case, and the press and media will be there. Due to the length of the flight and the time difference, I would need to leave the day before to be in Miami in time for the hearing. I also have another hearing on October 30th, which I put in for a continuance, but I have not received the court's order.
6. Ms. Dixon also has a federal status conference scheduled for October 31, 2025, at 9:30 am, People v. Reynoso 2:25-CR-00078-WLH. The AUSA and I filed a Joint Stipulation to continue, but it is unclear if the court will still require an appearance. I might be able to appear by zoom but that is difficult when out of state, and my flight is scheduled during that time.
7. Undersigned counsels, in good faith and without unnecessary delay, requests that this case be continued.
8. Undersigned counsel has conferred with Plaintiff's counsel, who oppose

the relief sought herein.

CONCLUSION

WHEREFORE, Ms. Cooper respectfully requests that this Court grant this Motion for Continuance.

CERTIFICATE OF GOOD FAITH CONFERENCE

Prior to filing this motion, the undersigned conferred with Plaintiff's counsel, in good faith, on October 28, 2025.

Respectfully submitted,

/s/ Jeremy McLymont, Esq.
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Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of October 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or

in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Jeremy McLymont
Jeremy McLymont, Esq.
Florida Bar No. 1010776